

Susan S.Q. Kalra (CA State Bar No. 16740)
Email: skalra@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, TX 77006
Telephone: (800) 993-7499
Fax: (832) 900-4941

William P. Ramey, III (Admitted pro hac vice)
Email: wramey@rameyfirm.com
RAMEY LLP
5020 Montrose Blvd., Suite 800
Houston, TX 77006
Telephone: (713) 426-3923
Fax: (832) 689-9175

Attorneys for Plaintiff
LAURI VALJAKKA

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

Case No. 4:22-SC-01490-JST

**PLAINTIFF'S NOTICE OF UNOPPOSED
MOTION AND UNOPPOSED MOTION
FOR LEAVE TO AMEND OR
SUPPLEMENT INFRINGEMENT
CONTENTIONS**

Hearing date: July 25, 2023

Time: 2:00 p.m.

Judge: Hon. Jon S. Tigar

Courtroom 6 – 2nd Floor

NOTICE OF MOTION AND MOTION

PLEASE TAKE NOTICE that on July 25, 2023 at 2:00 PM, or as soon thereafter as counsel may be heard, in the Courtroom of the Honorable Jon S. Tigar, 1301 Clay Street, Oakland, CA 94612, Plaintiff Lauri Valjakka (“Valjakka”) will and hereby does move the Court for an order granting Valjakka leave to amend or supplement his infringement contentions for U.S. Patent 8,495,167. Valjakka’s proposed contentions are attached hereto as Exh. A. The grounds for this motion are that Valjakka has good cause to amend his infringement contentions under Patent L.R. 3-6. The parties met and conferred on June 14, 2023 regarding the motion, and Netflix confirmed it would not oppose the motion on June 16, 2023. Ramey Decl., ¶ 4.

STATEMENT OF RELIEF REQUESTED

Pursuant to Patent Local Rule 3-6, Valjakka requests that this Court grant him leave to amend or supplement his infringement contentions as to U.S. Patent No. 8,495,167 (“the ‘167 Patent”).

Valjakka diligently discovered the basis for amending his infringement contentions. When Valjakka served his Infringement Contentions, Netflix had not yet produced source code and the experts completed their review a week ago. It was only when Valjakka’s experts were able to review the source code that Valjakka was able to confirm whether his doctrine of equivalents theories were supported by the expert’s analysis of the functionality of the code.

Valjakka also diligently sought leave to amend his Infringement Contentions. Valjakka’s experts completed their review of Netflix’s source code on June 9, 2023. Valjakka has spent the last week drafting, reviewing, and revising his proposed amended infringement contentions. Ramey Decl., ¶ 2. As soon as the proposed amended infringement contentions were completed, Valjakka provided Netflix with a copy of them on June 15, 2023. Ramey Decl., ¶ 3 and Ex. A thereto.

CONCLUSION

For all the foregoing reasons, Plaintiff Lauri Valjakka respectfully requests leave to amend his Infringement Contentions for the '167 patent with the Supplemental Contentions attached as Exhibit A to the Declaration of William P. Ramey, III.

DATED: June 16, 2023

Respectfully submitted,

RAMEY LLP

By: /s/ Susan S.Q. Kalra

Susan S. Q. Kalra CA SBN 167940

5020 Montrose Blvd., Suite 800

Houston, TX 77006

Telephone: (800) 993-7499

Fax: (832) 900-4941

Email: skalra@rameyfirm.com

RAMEY LLP

By: /s/ William P. Ramey, III

William P. Ramey III (Admitted *pro hac vice*)

5020 Montrose Blvd., Suite 800

Houston, Texas 77006

Telephone: (713) 426-3923

Fax: (832) 689-9175

Email: wramey@rameyfirm.com

Attorneys for Plaintiff

LAURI VALJAKKA